

1 Daniel R. Watkins
2 Nevada State Bar No. 11881
3 DW@wl-llp.com
4 Brian S. Letofsky
5 Nevada State Bar No. 11836
6 Brian.Letofsky@wl-llp.com
7 Eran S. Forster
8 Nevada State Bar No. 11124
9 eforster@wl-llp.com
10 WATKINS & LETOFSKY, LLP
11 8215 S. Eastern Ave., Ste. 265
12 Las Vegas, NV 89123
13 Office:(702) 901-7553; Fax: (702) 974-1297
14 Attorneys for Defendant, Watkins & Letofsky, LLP
15

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 AMY BUCHANAN

19 Case No.: 2:19-cv-00226

20 Plaintiff,

21 vs.

22 WATKINS & LETOFSKY, LLP., a Nevada
23 Limited Liability Partnership; and DOES 1-X,
24 inclusive,

25 Defendants.

26 **NOTICE OF REMOVAL OF ACTION
27 UNDER 28 U.S.C. § 1441(a)
28 (FEDERAL QUESTION)**

29 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

30 PLEASE TAKE NOTICE that defendant WATKINS & LETOFSKY, LLP, hereby
31 removes to this Court the state court action described below.

32 1) On December 24, 2018, an action was commenced in the Eighth Judicial District
33 Court of the State of Nevada, in and for the city of Las Vegas, County of Clark
34 (hereinafter, "Clark County District Court" or "CCDC"), entitled Amy Buchanan vs.
35 Watkins & Letofsky, LLP, et al., as case number A-18-786564-C, hereto attached as
36 Exhibit "A."

- 2) The first date upon which defendant Watkins & Letofsky, LLP received a copy of the plaintiff's complaint was January 22, 2019, when Defendant was served with a copy of the said complaint and a summons from CCDC. A copy of the summons is attached hereto as Exhibit "B."
- 3) This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by defendant pursuant to the provisions of 28 U.S.C. § 1441(a) in that it arises under the Americans with Disabilities Act of 1990 ("ADA") as amended by the Americans with Disabilities Act Amendments Act of 2008 ("ADAAA"), under 42 U.S.C. § 12101, et seq. and P.L. 110-325, for claims of discrimination and retaliation.
- 4) There are no other defendants in this action.

DATED: February 6, 2019

WATKINS & LETOFSKY, LLP

By: */s/ Daniel R. Watkins*

Daniel R. Watkins
Brian S. Letofsky
Eran S. Forster
8215 S. Eastern Avenue, Suite 265
Las Vegas, NV 89123
Office: (702) 901-7553
Fax: (702) 974-1297
Attorneys for Watkins & Letofsky, LLP